

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CHARLES C. FREENY III, BRYAN E. FREENY, and JAMES P. FREENY, Plaintiffs, v. ALIPHCOM d/b/a JAWBONE,	Case No. 2:16-cv-00674-JRG-RSP CONSOLIDATED
BOSE CORPORATION	Case No. 2:16-cv-00668-JRG-RSP

**JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT
AS TO DEFENDANT BOSE CORPORATION**

Plaintiffs Charles C. Freeny III, Bryan E. Freeny, and James P. Freeny (collectively “the Freenys”) and Defendant Bose Corporation (“Bose”) respectfully move the Court to stay all pending deadlines in the case as to Bose for 21 days until February 2, 2017.

The Freenys and Bose have settled, in principle, all matters in controversy between the parties and are in the process of finalizing settlement and dismissal papers for this action. The Parties therefore respectfully request the Court enter an Order staying all deadlines in this case as to Bose until February 2, 2017. A proposed order reflecting the Parties’ request for a stay is filed herewith.

Respectfully submitted on this 12th day of January, 2017 by:

/s/ Jennifer L. Gilbert

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CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2017, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via electronic mail.

/s/ Jennifer L. Gilbert
Jennifer L. Gilbert

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), the undersigned certifies that counsel for Charles C. Freeny III, Bryan E. Freeny, and James P. Freeny has met and conferred with counsel for Bose Corporation regarding this Joint Motion To Stay All Deadlines And Notice of Settlement As To Bose Corporation and the Parties have agreed to the requested relief and to file the motion jointly.

/s/ Jennifer L. Gilbert
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